EXHIBIT 7

Michael Gaffney v. Muhammad Ali Enterprises, LLC, et. al.

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Del	position of Michael Gaffney		Michael Gaffney v. Muhammad Ali Enterprises, LLC, et. al.
	Page 27		Page 29
1	CONFIDENTIAL	1	CONFIDENTIAL
2	2020.)	2	what I should be looking for; yeah.
3	Q. And Mr. Gaffney, did you review the	3	Q. Okay.
4	Complaint in the Second Action before it was filed?	4	A. But he was not
5	A. Yes, I did.	5	He was in California. I'm in Jersey, and
6	Q. And did you check to make sure each and	6	you know, I was doing the the the research
7	every allegation was true?	7	here.
8	A. Yes, I did.	8	Q. Okay. So, how did you know which
9	Q. Okay.	9	documents to search for?
10	MS. RUTHERFORD: Can we now have	10	A. Pardon me?
11	Number four, Andrew?	11	Q. How did you know which documents to search
12	These are the exhibits to the	12	101.
13	Complaint in the Second Action.	13	A. Well, we targeted the images that were
14	And can we mark this?	14	infringed upon.
15	THE COURT REPORTER: Yes. This	15	Q. Okay. Did you
16	would be Number seven.	16	And then what documents did you look for
17	MS. RUTHERFORD: Thank you.	17	in connection with that.
18	(Whereupon, Exhibits	18	A. Wait, run that question by me again.
19	- 2nd Action was	19	Q. I'll ask a different question.
20	marked as Exhibit 7	20	Mr. Gaffney, have you seen MAE and ABG as
21	for identification,	21	Written Requests for Documents?
22	as of November 20th,	22	A. I'm not sure if I've seen their requests.
23	2020.)	23	Q. Okay.
24	MS. RUTHERFORD: And can you give	24	A. I was
25	me control, please?	25	I was just trying to do research, and
_	*		
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1	Page 28 CONFIDENTIAL	1	Page 30 CONFIDENTIAL
2	Page 28 CONFIDENTIAL Whoops. I'll scroll through.	2	Page 30 CONFIDENTIAL find, like information regarding regarding the
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information for this chart that we're looking at --

A. Right.

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Q. -- you're saying --

You're referencing some other chart of exhibitions; is that correct?

A. I -- I --

When I was formulating all of this information, I -- I set -- set the images according to the exhibitions I was in; yes. So -- and then that information was drafted onto here.

Q. Okay. And when you --

Were you referencing any sale documents; for example, a bill of sale or a receipt, when you provided this information in the Date of First Publication column?

- A. You know, I believe I was through the invoices that came out of the Chelsea show; I believe that's the way I did it.
- Q. When did you first create this chart? 20 When did you provide the information in this chart? 22
 - A. Oh, last --

Probably almost a year ago.

Q. All right. The last new date --

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A. I don't --

You know what, I mean, I can check that, but I --

I started working on researching it for Jefferson Sedlik, the photo expert, and we just moved forward from there. I don't --

My timeline's a little bit -- a little bit off. I'm not accurate on the -- on the dates, but --

- Q. Okay. So, the last date that's new here is January 17th, 2012; that's Ali 95. Do you see that?
 - A. Ali 95 --

It just goes down to 85. I can't move it down further.

- Q. There isn't an 85. There's a 95. That's Ali with hand on head after a loss. 18
 - A. Oh, okay. Yeah. I'm sorry.
 - Q. I know. It's hard to read. It's --Sorry about that.
 - A. Okay. Ali --
 - Q. Let me see if I can make it bigger.
- 24 A. Okay. Ali 95. Yeah. That's when he lost to Spinks.

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Q. Okay. And so the date here you see is January 17th, 2012. I managed to make it a little bit bigger. Do you see that?

- A. Yes, I see it.
- Q. Okay. What's the significance of that date?
- A. Well, it's either an exhibition, or a sale of a print through San Francisco Art Exchange, or Saatchi Art; they're selling my prints.
- Q. Okay. Do you have copies of all of the receipts from the sale of your prints?
 - A. Yes, most of them.
 - Q. Okay. Did you give them to your attorney?
 - A. Yes.

MS. RUTHERFORD: Those were not produced to us, Mr. Allen, so that will be in my letter as well.

> (Request for production.)

A. Okay. We have those. Those are on file. MS. RUTHERFORD: Okay.

MR. ALLEN: I don't know, Jessica, if those were covered by any of the requests for production. So, if we do,

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we're happy to produce them. If not, we obviously would request that you provide new requests for production.

MS. RUTHERFORD: They were included. We asked for all documents related to the Date of First Publication, and documents related to any sale or license, if --

Q. Okay. I want to --

MS. RUTHERFORD: We're done with that exhibit. Thank you, Andrew.

Q. Now, Mr. --

You mentioned --

Let me ask you this; are you familiar with Bill and Maureen Dubrot?

- A. Yes.
- Q. Okay. And you know them to own a company called Land of Legends; is that right?
 - A. That's correct.
- Q. Okay. You signed an agreement with them on June 6th, 1997?
 - A. That's correct.
 - O. Okav.

MS. RUTHERFORD: Andrew, can we

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that this was one of the people that I dealt with. It didn't work out, but, you know, I brought it forward, to keep it honest. 5

Q. Okay. Again, I'm trying to get a date when you retrieved the slides.

A. Not --

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I can't --

(Simultaneous speaking.)

Q. Can you give me --

A. Jessica, I can't remember. All I know was, it was a very short period of time. I think, you know, somewhere in the period of a month, maybe sooner than that. It was a very bad period for me. It was the first time I had tried anything, and it was not successful, and I wanted to end it, and get my images back, and not be -- not be bothered with this person.

Q. Okay. So, if it all happened within a month, that would mean sometime in the month of October, you probably got the images back; fair, given that you signed the Agreement in September?

A. I would --I mean. I'm --

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I totally don't remember accurately. So, I'm going to tell you I don't remember how long the period of time it was that, you know, it was determined that it wasn't working out for me, and I wanted to protect the images, so I got them back.

Q. Okay. And the slides, did those have copyright notices on them?

A. Yes.

Q. How was that printed?

A. How were the slides printed?

Q. No; how were the copyright notice printed 12 on the --13

> (Simultaneous speaking.)

16 A. Oh, it was attached to the slides with a -- you know, it was a small, "c, Michael Gaffney," 17 probably, "all rights reserved."

Q. Okay.

A. You know, pretty much identifying that there was a copyright with it.

Q. Okay. You think that was written on the -- on the frame of the slide?

24 A. Yes.

Q. Okay. Now --

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A. Written or attached in a label, on a label that was attached to the slide.

Q. Okay. I'm just curious; if this all happened in a month, how many prints did you expect Land of Legends to sell within a month?

A. Well, that wasn't the point. The point was, he was terrible to deal with, communication, everything else, and, you know, my expectation was that he be forthright with me, and keep me -- keep me posted on what was going on with the --

He was doing his show, and it just seemed not a workable situation.

Q. Okay.

A. So, whether or not it was a month, or two months, it was not a -- not a productive period. He did not report back to me any sales and, you know, he failed on the fulfillment of the contract as far as his promises for -- for, you know, for promotion and marketing.

Q. Okay. I don't see anything about promotion or anything. What was his promises with respect to promotion and marketing?

A. Pardon me?

Q. I don't see anything in this written

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Agreement about promotion and marketing. My question to you is what were his promises with respect to promotion and marketing?

A. Well, he would, I guess promote these at --

I guess he was hosting boxing events, celebrity signings. Um, I didn't know much about his business, but, you know, as far as my expectation of what he was going to produce for me, he -- he avoided all conversations about everything he was doing. He was very difficult to get in touch with, seemed to be elusive, didn't return phone calls, and I just had several arguments with him, and was not satisfied with the whole business of his -- business operation, and ended it.

Q. Okay. You mentioned that he was doing a show; was that, like an exhibition of photographs?

A. No, it wasn't an exhibition. He was doing --

He would have events where he would have --

I didn't know his business all that well. So, speaking off the top of my head here, but, as ²⁵ far as I knew, he was having celebrity signature

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Page 143

Deposition of Michael Gaffney

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contests, celebrity signings, and he'd have boxers in, and then he would sell his merchandise, and photographs, and when I -- when I --

When I talked to him, he was very elusive, and it just didn't work out.

- Q. Okay. And at these shows, did he offer any of these -- any of the Muhammad Ali prints?
- A. Did he offer them? I have no idea. I don't know what he did.
 - Q. Okay.
- A. The point I'm trying to make here is, this was a unsuccessful deal that went bad, so I got my stuff back and that was the end of it.
- Q. Understood. And so you said he didn't report any sales. Do you think that he made sales and just failed to report them to you?
- A. I don't know. I have no idea. All I know is he wasn't -- he wasn't -- he wasn't --

He wasn't forthright and honest with me and to the point where, you know, I asked him for reports; never got anything.

And so I said, you know, "we're done." I don't want to deal with somebody who can't be honest with me; I'm honest with them, and that was the end

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of it. So, do I know if he made a sale? No. I didn't know anything.

He didn't report anything back to me at all. If he did or he didn't, I have no idea at all.

- Q. Okay. How many shows took place between the time that you gave him the slides and the time that you took them back?
 - A. How many shows -- Explain yourself there.
- Q. Well, you mentioned that he was doing these shows with boxers and celebrity signings, I'm wondering how many of those took place between the time that you delivered the slides to him and the time that you took them back?
- A. I -- I don't know the answer to that. I'm being candid here. I don't know if he had one show or five shows, or whatever. I don't know. That was part of the problem. I didn't --

I wasn't getting information back from him, and so -- and so I really don't know what he was doing.

Q. Okay.

A. And I -- I don't even know if he was on the Internet back then. I don't know. There

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wasn't -- you know. I think it's a lot different now; you can track everything, but, you know, back then, I don't know if he had an Internet presence or not. I don't even think I was on email back then, so --

- Q. Okay. Let's see. If he had the sales sheet with ten images on it, could he make prints from that?
- A. From the sale sheet? Could he make prints from the sale sheet?
 - Q. Yeah.
- A. No. Not --

I mean, the quality would be off; nobody would buy a print like that.

Q. Okay.

MS. RUTHERFORD: Okay. I think we're done with that exhibit. Thank you.

- Q. I want to ask you about your book, The Champ: My Year With Muhammad Ali.
- A. Okay.
- Q. You published that book yourself in 2012, correct?
 - A. Correct.

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- Q. And why did you decide to publish the book yourself in 2012?
 - A. Well, I was exhibiting --

You want the full story? I was exhibiting in London, and I was being interviewed at a radio station, and the last thing that they asked me during the interview was, "so, do you have a book you're going to promote?"

And I said, "no, but I'm working on one," and, Joanna was out in the sound stage after the interview and she said, "so when did you start the book?"

And I said, "right now," so I started the book.

I'll tell you what happened; I didn't realize the popularity of Muhammad Ali until I went to London, and it was a magnificent show, and magnificent turnout. We had boxers coming in. It was just a tremendous exhibition, and the greatest influence for me was, I need to put my story together on my -- on my adventure -- my experience with Muhammad Ali, and so that's what I did.

So, I started working on it. Took me a couple of years to do, and, you know, that's what

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Dej	position of Michael Gaffney		Michael Gaffney v. Muhammad Ali Enterprises, LLC, et. al.
	Page 183		Page 185
1	CONFIDENTIAL	1	CONFIDENTIAL
2	said, "real estate," but whatever.	2	Q. Okay. And the next
3	Q. I'm just referring to right here, to	3	MS. RUTHERFORD: Can we mark this
4	the provision 1.1.2, which calls it:	4	as the next exhibit, please?
5	"Themed real estate projects." Okay.	5	(Whereupon, Bates 153
6	Let's look at the document that is Bates numbered	6	to 154 was marked as
7	203 to 206, please.	7	Exhibit 15 for
8	Can I have	8	identification, as of
9	Do you recognize this document, Mr.	9	November 20th, 2020.)
10	Gaffney? Do you need me to scroll through it?	10	Q. So, this document that you signed, this
11	A. Yeah, it's the Agreement with when ABG	11	amends the License Agreement that we were just
12	took over.	12	rooking at, correct.
13	Q. Okay. So, ABG now controls	13	A. Yes; that's right, yes.
14	It says, "ABG now controls MAE	14	Q. Okay. The next document. Let's see, on
15	photographer agreements, including your Agreement	15	January 14th, 2015, you sent MAE a Proposal,
16	, with it. 22, 11gm.	16	concer.
17	A. Right.	17	A. That's correct.
18	Q. Okay. And let's see, can I get control?	18	Q. That
19	The seron down the sottom. This is your	19	A. Do you have that document?
20	signature, correct?	20	Q. Yeah. We're going to look at the
21	A. Yes.	21	document; that's Bates numbered 153 to 154.
22	Q. And then there's some contact information,	22	A. Okay.
23	and then there appears to be another signature page.	23	MS. RUTHERFORD: Can I have control
24	A. Okay.	24	please?
25	Q. This time dated July 12th, 2014; is that	25	THE WITNESS: Pardon me?
	Page 184		Page 186
1	CONFIDENTIAL	1	CONFIDENTIAL
2	your signature?	2	MS. RUTHERFORD: I just asked for
3	A. Yes. It is.	3	control.
4	Q. Okay. And this	4	THE WITNESS: Oh.
5	But the first time you signed on this	5	Q. My question for you is, is this a copy
6	page, which is Bates number 204, it it's	6	of of the proposal that you made to MAE on
7	A. 204.	7	January 14th, 2015?
8	Q. It looks like the time dated January 24th,	8	A. Mh-hm.
9	2014; do you see that there? There appears to be	9	Q. Is that a yes?
10	,		
11	two signature pages.	10	A. That's
	two signature pages. A. Yeah.	10 11	That's correct.
12	two signature pages. A. Yeah. Q. The second document is January 24th	10 11 12	That's correct. Q. Okay.
13	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous	10 11 12 13	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this
13 14	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.)	10 11 12 13 14	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please?
13 14 15	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of	10 11 12 13 14 15	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter
13 14 15 16	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it.	10 11 12 13 14 15 16	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit
13 14 15 16 17	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it. Q. Okay. So	10 11 12 13 14 15 16	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit 14 for
13 14 15 16 17 18	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it. Q. Okay. So A. And they wanted to	10 11 12 13 14 15 16 17	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit 14 for identification, as of
13 14 15 16 17 18	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it. Q. Okay. So A. And they wanted to They wanted to ascertain what if they	10 11 12 13 14 15 16 17 18	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit 14 for identification, as of November 20th, 2020.)
13 14 15 16 17 18 19 20	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it. Q. Okay. So A. And they wanted to They wanted to ascertain what if they had all the photographs.	10 11 12 13 14 15 16 17 18 19 20	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit 14 for identification, as of November 20th, 2020.) Q. And what was your purpose for sending this
13 14 15 16 17 18 19 20 21	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it. Q. Okay. So A. And they wanted to They wanted to ascertain what if they had all the photographs. Q. Well, you signed the document twice,	10 11 12 13 14 15 16 17 18 19 20 21	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit 14 for identification, as of November 20th, 2020.) Q. And what was your purpose for sending this letter?
13 14 15 16 17 18 19 20 21 22	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it. Q. Okay. So A. And they wanted to They wanted to ascertain what if they had all the photographs. Q. Well, you signed the document twice, right?	10 11 12 13 14 15 16 17 18 19 20 21	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit 14 for identification, as of November 20th, 2020.) Q. And what was your purpose for sending this letter? A. Well, this was January 14th. The contract
13 14 15 16 17 18 19 20 21 22 23	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it. Q. Okay. So A. And they wanted to They wanted to ascertain what if they had all the photographs. Q. Well, you signed the document twice, right? A. Right.	10 11 12 13 14 15 16 17 18 19 20 21 22 23	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit 14 for identification, as of November 20th, 2020.) Q. And what was your purpose for sending this letter? A. Well, this was January 14th. The contract was set to expire at the end of the month,
13 14 15 16 17 18 19 20 21 22	two signature pages. A. Yeah. Q. The second document is January 24th (Simultaneous speaking.) A. I think they were in the process of negotiating a deal with MAE to buy it. Q. Okay. So A. And they wanted to They wanted to ascertain what if they had all the photographs. Q. Well, you signed the document twice, right?	10 11 12 13 14 15 16 17 18 19 20 21	That's correct. Q. Okay. MS. RUTHERFORD: Can we mark this as an exhibit, please? (Whereupon, a Letter was marked as Exhibit 14 for identification, as of November 20th, 2020.) Q. And what was your purpose for sending this letter? A. Well, this was January 14th. The contract was set to expire at the end of the month, January 31st, and I attempted to renegotiate the

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Deposition of Michael Gaffney

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Q. Okay. And --

And the terms that you proposed were for a buyout, correct?

- A. That was part of the -- part of the deal; yeah.
 - Q. Okay. It says here.

"The entire Collection is being offered to ABG for the buyout fee of \$100,000, which would assign all rights of ownership to ABG for the sale to licensees of all products, services, promotional uses assigned by ABG for all time with the following exceptions."

And when it says, "The entire Collection," it's referring to 86 photographs of Muhammad Ali that are presently listed, and 25 additional paragraphs that could be added to the Collection upon review and acceptance by ABG, correct?

- A. Yeah, that was the offer.
- Q. Okay. And you say those additional 25 photographs are mostly portraits of Muhammad Ali that have commercial value and also -- and also photographs of Muhammad Ali's children, which were previously excluded because of an Agreement with MAE. That's -- that's the Agreement you referenced

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earlier about how MAE couldn't use photographs of Muhammad Ali's children, correct?

- A. Right.
- Q. But now you were offering those photographs to MAE again?
- A. Well, I wanted to see if they would be interested in negotiating that clause out of -- out of the contract with Ali, so that they could be used. The children are older, and I think the protected value that are -- that are Ali originally had would be -- it was an idea that I had. I don't know if it was going to work or not, but I put it out there thinking that they would want to do that.
- Q. Okay. And your proposal was that you would offer this buyout in exchange for \$100,000, correct?
 - A. That's correct.
- 19 Q. And this wasn't just a license, right? It was --20

It was an assignment of all rights of ownership, correct?

- A. That's correct.
- Q. Okay. There were a few exceptions that you identified here. You wanted to maintain the

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right to use the photographs for books and editorial purposes, limited edition fine art prints, right?

- A. Right; that's correct.
- Q. And you also wanted a 10 percent royalty against fees collected by ABG from authorized licensees for advertising and advertising campaigns, correct?
 - A. That's correct.
- Q. Okay. And you explain here how that royalty would work?
 - A. That's right.
- Q. Okay. So, how did you come out with this figure of \$100,000 for the buyout? I -assignments, not just licenses, but assignments of all ownership rights in all of those photographs subject to the limitations we just discussed?
- 18 A. Well, I looked at it like I couldn't do anything with them for advertising with them, for one. I couldn't -- they could without going through them. I couldn't do anything with merchandising. They owned all of the -- the rights to that, and I 23 could still retain work for editorial books, exhibitions, fine art prints. So, I looked at it, like it might work out for both of us.

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- Q. Okay. Because your own ability to use the photographs was limited, right; by the fact that you don't control Muhammad Ali's rights of publicity, correct?
 - A. Wait, say that again.
- Q. Your own ability to use the photographs was limited by the fact that you don't control Muhammad Ali's rights of publicity, correct?
- A. Not so much for publicity, but for products and merchandise.
- Q. Okay. So, in other words, you can't use the photographs in connection with products, merchandise, advertising, right, without --
- A. Permission.
 - Q. -- without permission?
- 17 A. Without Agreement permission from them.
 - Q. With a permission from MAE, correct?
 - A. That's correct.
- 20 Q. Okay.
 - A. That's correct.
- 22 O. And so --
- A. In fact, when I have an exhibition, I have 23
- 24 to be very careful that its Michael Gaffney
 - photographs of Muhammad Ali, or The Champ Muhammad

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Page 191 1 **CONFIDENTIAL** 1 CONFIDENTIAL 2 Ali, but I can't use advertising of Ali's name You offered two different options, unless it's connected to an exhibition. I can't use correct; Option A and Option B? it for anything else. A. I guess, yeah. Q. Okay. But if MAE controls rights in the 5 5 Q. Okay. And Option A, again, involves the photographs, they don't need any further permission, buyout for \$100,000, and Option B is a photo use fee right? Because they -of \$50,000 for the entire Michael Gaffney Collection for the term of four years, and then you wanted some They already have the permission to use the photographs in connection with merchandise, or changes to the compensation provisions, correct? products, or advertising, correct? 10 10 A. Right. 11 11 A. During the term of my contract; yeah. (Simultaneous 12 12 Q. Okay. speaking.) A. During the term of the contract. Like I 13 Q. The -- the right --13 said before, there's a beginning, there's an end. 14 (Simultaneous 14 Q. Right. And so --15 speaking.) 15 So, in other words --16 Q. -- provisions, correct? 16 So, let me ask a different question. 17 A. Right. 17 So, how did you come up with the 18 Q. Okay. You asked for a present in the 18 19 \$100,000-figure there? 19 5.1.1, in the royalty percentage, you wanted to increase it from 30 percent to 50 present? 20 A. It sounded --It sounded like it might be engaging for 21 A. Okav. 21 22 Q. And what do you expect to have from 5.1.1 22 them. 23 to 5.1.2? 23 Q. Okay. 24 A. It might be attractive for them to have 24 A. If they negotiate --25 the Collection available. If they wanted to use the photographs in Page 192 1 **CONFIDENTIAL** 1 CONFIDENTIAL 2 Q. Okay. an advertisement, the fee would be negotiated. 3 3 A. You know, you're --Q. Okay. So, that was --4 You know, there's a --There was no change to that? That's the 4 5 same as the original 5.1.2? Go ahead. 6 Q. So, at the time, you thought that this was 6 A. That's in the original --7 a good deal for you, right? No, not really. It's --It's different. I asked for 10 percent on 8 A. Yeah, I wouldn't have offered it if I 8 9 didn't think it was a good deal for me. the advertising in the first offer and on this one, 10 but I reverted back into the contract, what's Q. Right. 11 existing in the contract --11 MS. RUTHERFORD: Okay. Can we look 12 12 at the document Bates numbered 156 to Q. Okay. 13 13 158, please, and can I have control, A. -- which is negotiation for an endorsement 14 please. 14 of goods or services. 15 Q. Got it. But you didn't request any change Q. Do you recognize this document? 16 A. Yes, I do. 16 to 5.2 with respect to marketing and promotional 17 O. What is it? 17 purpose use, correct? 18 18 A. That's the --A. No, that was not --19 19 The second letter. The second email to That was not considered an issue, because 20 Jasen Wright, and I'm not quite sure if he ever 20 that was for the terms and conditions of the responded to the first one, and so I -- I offered up 21 contract. 22 a -- another, I guess another -- another inducement Q. Right. In other words, you didn't want to

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and that was February 11th. It was -- we're now

Q. Okay. And what is your offer in this --

passed the -- the contract had expired already.

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change the terms and conditions of the original

thereof for marketing and promotional purposes?

contract with respect to compensation or lack

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CONFIDENTIAL Thank you. Okay. And can we scroll down to the bottom. Thank you. Okay. And can we scroll down to the bottom. Thank you. Okay. This is one of your images, correct? This is one of your images, correct? A. Yes, it is. O. Okay. And this is a screenshot of — of ABG's Muhammad Ali verified social media site, correct? MS. RUTHERFORD: Excuse me, can you just scroll up, please. O. Okay. This is a screenshot of Muhammad Ali verified social media site, correct? A. That's what it says, "MAE/ABG," I don't know if that's the verified site. O. Okay. This is a screenshot of Muhammad Ali verified social media site, correct? A. That's what it says, "MAE/ABG," I don't know whore the got if that's the verified site. O. Okay. This is a screenshot of Muhammad Ali verified social media site, correct? A. That's what it says, "MAE/ABG," I don't know. We've going to mark this with the next exhibit number, please. O. Okay. Decument S77 was marked as Exhibit 20 for Page 228 Exhibit 20 for Page 228 CONFIDENTIAL identification, as of November 20th, 2020.) O. Ali right. So, that number down here, A. No. O. Okay. Do you know who created it? A. Who created it? I don't know. It looks illed where the image came from; is that the questioned it? O. Okay. Do you know who created it? created the image. O. Okay. Do you know who created it? created the image. O. Okay. Do you know who created it? created the image. O. Okay. Okay. O. Okay.		position of whenaer Garriey		Whenaer Garriey V. Wunammad Am Enterprises, EEC, et. ai.
Thank you. Okay. And can we scroll down to the bottom. Thank you. Q. Okay. This is one of your images, correct? A. Yea. it is. Q. Okay. And this is a screenshot of — of ABG's Muhammad All verified social media site on — is. MS. RUTHERFORD: Excuse me, can you just scroll up, please. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That's what it says, "MAE/ABG." I don't know there has a social media? With 8a,000 others, it looks like. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That's what it says, "MAE/ABG." I don't know there he saw read it? from or where he got it, but it was shared along with 8a,000 others, it looks like. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That's what it says, "MAE/ABG." I don't know where he saw read it? sow of the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, as to what it in the saw your photographs on social media? MR. ALLEN: Jessica, the saw the saw to my the saw the saw to what it in			_	
Okay. And can we scroll down to the bottom. Thank you. Q. Okay. This :- This is one of your images, correct? A. Yes, it is. Q. Okay. And this is a screenshot of — of ABG's Mohanmad All verified social media site on — MS. RUTHERFORD: Excuse me, can you just scroll up, please. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. Tat's what it says, "MAE/ABG," I don't know where he shared it from or where he got it, but it was shared along with 88,000 others, it looks like. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That's what it says, "MAE/ABG," I don't know if that's the verified site. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. On the top here. MS. RUTHERFORD: Andrew, can you scroll down. We're going to mark this with the next exhibit number, please. (Whereupon, Document \$25				
the bottom. Thank you. Q. Okay. This This is one of your images, correct? A. Yes, it is. Q. Okay. And this is a screenshot of of ABG's Muhammad Ali verified social media site on John St. RUTHERFORD: Excuse me, can you just scroll up, please. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That's what it says, "MAE/ABG," I don't know it harfs the verified site. Q. Where are you looking? A. On the top here. Were going to mark this with the next exhibit number, please. (Whereupon, Document 877 was marked as Exhibit 20 for Sorry, did your son ever appropriate to you that he saw your protographs no social media? MR. ALLEN: Jessica, as to what time? A. That what it says, "MAE/ABG," I don't know where he got it, but it was shared along with 88,000 others, it looks like your can share any photographs. So, I don't know where he social media? Works, but it looks like you can share any photographs. So, I don't know where he shared it from or where he got it, but it was shared along with 88,000 others, it looks like on Sorry, did your son ever appropriate to you that he saw your photographs no social media? MR. ALLEN: Jessica, as to what time? Q. Ever. A. That we're going to mark this with the next exhibit number, please. (Whercupon, Document 877 was marked as Exhibit 20 for Page 228 CONFIDENTIAL identification, as of Page 228 Exhibit 20 for Page 228 CONFIDENTIAL identification, as of Page 228 A. No. Q. Okay. Do you know who created it? A. No, he didn't mention it. Page 230 CONSTIDENTIAL OLI THERFORD: Can we look at document number. Sorry, did your son ever appropriate to you that the saw your photographs no social media? MR. ALLEN: Jessica, as to what time? Q. Ever. A. That we're going to mark this with the next exhibit mumber, please. (Whercupon, Document 101 102 103 104 105 105 106 107 108 109 109 109 109 109 109 109 109 109 109	2			
Thank you. Q. Okay. This : - This is one of your images, correct? A. Yes, it is. Q. Okay. And this is a screenshot of of ABG's Muhammad Ali verified social media site on- MS. RUTHERFORD: Excuse me, can you just scroll up, please. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That's what it says, "MAE/ABG," I don't know if that's the verified site. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That's what it says, "MAE/ABG," I don't know if that's the verified site. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That's what it says, "MAE/ABG," I don't know if that's the verified site. Q. Okay. This is a screenshot of Muhammad Ali's verified social media site, correct? A. That he- We're going to mark this with the enxt exhibit number, please. (Whereupon, Document Constitution of the interier? No; on social media? Exhibit 20 for Page 228 CONFIDENTIAL identification, as of CONFIDENTIAL identification, as of A. No. Q. Okay. Do you attorneys to us. Have you ever seen this document before? A. No. Q. Okay. Do you attorneys to us. Have you ever seen this document before? A. Whor created it? I don't know. It looks like mys on and 88,000 on the rileder it. I have no idea where the image carne from; is that the question? Do I know who created the image. Q. Okay. A. Where this document came from? Q. Okay. A. Where this document came from? A. Where this document came from? Q. Yes. A. That we're looking at right now? Q. Okay. A. That we're looking at right now? Q. Okay. A. That we're looking at right now? Q. Okay. A. That we're looking at right now? Q. Okay. Q. Okay. Do your know hor created the document, you're saying? Q. Ocrrect. Works, but it looks like. Q. Okay. Look and admoment along the from where he good at time the from where he way your by you have you have the image. C. Okay. A. That we're looking at right now? Q. Okay. A. No, not really. I mean, you know, if I was having a show, an exhi	3		3	
Q. Okay. This is one of your images, correct?	4		4	
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	position of whenael Garriey		Michael Garmey V. Muhammad All Enterprises, LLC, et. al.
	Page 235		Page 237
1	CONFIDENTIAL	1	CONFIDENTIAL
2	it's even close.	2	Q. Okay. And the last payment you received
3	Q. Okay.	3	was in 2018, correct?
4	A. You have better records than I do of that.	4	A. Fifty-four cents.
5	MS. RUTHERFORD: Can we look at	5	Q. \$5.53. \$4.53.
6	document 1652, please.	6	A. Okay. I guess.
7	THE WITNESS: You did say 1652,	7	Q. In other words, ABG continued to pay you,
8	right?	8	at least it is shown here, through 2018, correct;
9	MS. RUTHERFORD: That's it. That's	9	for your licensing
10	the number of the document. So, an	10	(Simultaneous
11	Excel spreadsheet	11	speaking.)
12	And can you make it bigger, so we	12	A. I don't know if they've continued to pay
13	can see the numbers there.	13	me.
14	THE WITNESS: Yeah, I can see it.	14	Q. I'm sorry?
15	MS. RUTHERFORD: Wow, you have	15	A. Where's you
16	better eyesight than I do.	16	The rest of 2018 and 2019 and 2020, I
17	THE WITNESS: Well, I have glasses	17	didn't receive anything.
18	on, too, so	18	Q. This only goes through Q3 of 2018, right?
19	MS. RUTHERFORD: Okay.	19	A. Right.
20	Andrew, can you make that a little	20	Q. But the royalties are sort of dropping
21	bit bigger, so that we can see it?	21	off. So, \$4.53 in Q1 of 2018; this just doesn't
22	THE VIDEOGRAPHER: It's not letting	22	show any royalties that were even actually due to
23	me enlarge it. Okay. It's not letting	23	you beyond that.
24	me manipulate the document.	24	A. Well, I don't know that what was due to
25	MS. RUTHERFORD: Maybe if you turn	25	me. I haven't received anything.
	Page 236		Page 238
1	Page 236 CONFIDENTIAL	1	Page 238 CONFIDENTIAL
1 2		1 2	
	CONFIDENTIAL		CONFIDENTIAL
2	CONFIDENTIAL it into a PDF; that did the trick last	2	CONFIDENTIAL Q. Okay.
2	CONFIDENTIAL it into a PDF; that did the trick last time.	2	CONFIDENTIAL Q. Okay. MS. RUTHERFORD: And we can take
2	CONFIDENTIAL it into a PDF; that did the trick last time. Q. Okay. Mr. Gaffney, I'm looking at	2 3 4 5	CONFIDENTIAL Q. Okay. MS. RUTHERFORD: And we can take that down. Q. And how much money have you generated from
2 3 4 5	CONFIDENTIAL it into a PDF; that did the trick last time. Q. Okay. Mr. Gaffney, I'm looking at This was a document produced by ABG, and it shows the payment history to you for licensing of	2 3 4 5	CONFIDENTIAL Q. Okay. MS. RUTHERFORD: And we can take that down. Q. And how much money have you generated from
2 3 4 5 6	CONFIDENTIAL it into a PDF; that did the trick last time. Q. Okay. Mr. Gaffney, I'm looking at This was a document produced by ABG, and it shows the payment history to you for licensing of	2 3 4 5 6	CONFIDENTIAL Q. Okay. MS. RUTHERFORD: And we can take that down. Q. And how much money have you generated from your use of the photos, Mr. Gaffney?
2 3 4 5 6 7	CONFIDENTIAL it into a PDF; that did the trick last time. Q. Okay. Mr. Gaffney, I'm looking at This was a document produced by ABG, and it shows the payment history to you for licensing of your photographs.	2 3 4 5 6 7	CONFIDENTIAL Q. Okay. MS. RUTHERFORD: And we can take that down. Q. And how much money have you generated from your use of the photos, Mr. Gaffney? A. Since I started exhibiting? Ballpark,
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	DOSITION OF WITCHAEF Garriey		Michael Garriey v. Muhammad All Emerprises, LLC, et. al.
	Page 251		Page 253
1	CONFIDENTIAL	1	CONFIDENTIAL
2	upon any expiration or termination of the Agreement,	2	15. Let's do 15.
3	MAE may continue to exercise the license rights	3	THE WITNESS: Oops, you have to
4	granted to it in Paragraph 1.1 with respect to all	4	bring it down.
5	licenses and/or agreements made prior to the date of	5	Q. So, pursuant to this letter that you had
6	termination."	6	sent
7	Is that your understanding?	7	A. Wait a minute. I'm not on the same page.
8	A. Yes.	8	I'm on Jasen Wright here.
9	Q. Is it your understanding that this doesn't	9	O. Yes.
10	cover anything other than licenses and	10	MR. ALLEN: This is Exhibit 15.
11	(Simultaneous	11	Q. This is an email that you had sent to
12	speaking.)	12	Jasen Wright.
13	A. That was	13	A. Okay. All right.
14	Q that would be covered in Paragraph 1.1?	14	Q. And you were making an offer to him to
15	A. It covers only the terms and the	15	enter into a new deal; is that correct?
16	conditions of the existing contract of the	16	A. Yes; that's correct.
17	contract that was signed. Anything after that	17	Q. Was this offer ever accepted?
18	(Simultaneous	18	A. No, in fact
19	`	19	, , , , , , , , , , , , , , , , , , ,
20	speaking.)	20	In fact, it it
21	Q went to	21	He never agreed to it. I never agreed to
22	It seems to indicate:	22	it, and we got to a surganning position where he
	"All lines and agreements will continue to	23	sare, Look, we're going to keep the ord contract.
23	exercise freelise rights, and my question for you		Take it or leave it."
24	15, 15 it your understanding that that merades only	24	And I said, "I'm leaving it. I'm done."
25 ——	1.1.2, or in your mind, does it also include the Page 252	25	And that was
	Page /3/		
_		_	Page 254
1	CONFIDENTIAL	1	CONFIDENTIAL
2	CONFIDENTIAL promotional and marketing purposes in 1.1.2?	2	CONFIDENTIAL That was when I sent him the that
2	CONFIDENTIAL promotional and marketing purposes in 1.1.2? A. It provides the terms and conditions of	2	CONFIDENTIAL That was when I sent him the that termination email, which forbid them from continuing
2 3 4	CONFIDENTIAL promotional and marketing purposes in 1.1.2? A. It provides the terms and conditions of the contract.	2 3 4	CONFIDENTIAL That was when I sent him the that termination email, which forbid them from continuing to use the photographs.
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